(D) BELLSOUTH

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RECULATION: Guy M. Hicks

General Counsel

EXECUTIVE DEV

September 7, 2001

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VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

> Re: Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations Docket No. 01-00362

Dear Mr. Waddell:

On the afternoon of Tuesday, September 4, 2001, AT&T filed a Motion for Reconsideration and Clarification of the Authority's Plan to Determine the Extent of Third-Party Testing Necessary to Assess the Compliance of BellSouth Telecommunications, Inc.'s Operational Support Systems with State and Federal Law, a Motion for Discovery and a Motion for Michael A. Hopkins to Appear *Pro Hac Vice*. SECCA joined the Motions for Reconsideration and Discovery. BellSouth was served via fax with these motions after close of business that day. The faxed service copy of the Motion for Reconsideration did not include any of the attachments to the Motion. These attachments were provided to BellSouth the following day. On September 6, the Hon. Lynn Greer, Hearing Officer, held a prehearing conference during which the motion for discovery was addressed.

During the pre-hearing conference, the Hearing Officer stated that he anticipated that BellSouth would be filing a written response to the Motion for Reconsideration. BellSouth does intend to respond to the Motion for Reconsideration. BellSouth may also respond to the Motion for Discovery. To the extent that Authority rules may require a response to these motions within seven

David Waddell, Executive Secretary September 7, 2001 Page 2

days of service, BellSouth respectfully requests an extension until Friday, September 14 to file its response.

Thank you for your attention to this matter. A copy of this letter is being provided to counsel of record.

Hery truly yours,

Guy M. Hicks

GMH:ch Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

[] Hand[] Mail[] Facsimile[] Overnight	James P. Lamoureux AT&T 1200 Peachtree St., NE, #4068 Atlanta, GA 30367
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